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7 Counsel to Debtors
8 Alan Gomperts, Daniel Halevy, and
Susan Halevy
9

10 **UNITED STATES BANKRUPTCY COURT**
11 **CENTRAL DISTRICT OF CALIFORNIA – LOS ANGELES DIVISION**

12 In re:

13 SEATON INVESTMENTS, LLC, *et al.*,

14 Debtors and Debtors in
15 Possession.
16
17

Lead Case No. 2:24-bk-12079-VZ

Jointly Administered with Case Nos.:
2:24-bk-12080-VZ; 2:24-bk-12081-VZ;
2:24-bk-12082-VZ; 2:24-bk-12091-VZ;
2:24-bk-12074-VZ; 2:24-bk-12075-VZ
and 2:24-bk-12076-VZ

Chapter 11

- 18 ☐ Affects All Debtors.
19 ☐ Affects Seaton Investments, LLC
20 ☐ Affects Colyton Investments, LLC
21 ☒ Affects Broadway Avenue Investments, LLC
22 ☒ Affects SLA Investments, LLC
23 ☒ Affects Negev Investments, LLC
24 ☒ Affects Alan Gomperts
25 ☐ Affects Daniel Halevy
26 ☒ Affects Susan Halevy
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**STIPULATION TO FURTHER
CONTINUE HEARING ON MOTION
TO AUTHORIZE USE OF CASH
COLLATERAL PURSUANT TO 11
U.S.C. § 363(c)(2)**

Current Hearing:

Date: November 12, 2024
Time: 11:00 a.m.
Crtrm.: 1368

Proposed Continued Hearing:

Date: December 10, 2024
Time: 11:00 a.m.
Crtrm: 1368

1 SLA Investments, LLC (“SLA”), Negev Investments, LLC (“Negev”), Susan Halevy
2 (“Susan” or “Susan Halevy”), and Alan Gomperts (“Alan” or “Alan Gomperts”), debtors and
3 debtors-in-possession (the “Debtors”), Archway Broadway Loan SPE, LLC, successor-in-interest
4 to Archway Real Estate Income I REIT, LLC fka Archway Real Estate Income Fund I SPE I, LLC
5 (“Archway”), Wells Fargo Bank National West (“Wells Fargo”) as to the 2220 Bagley Ave and
6 3538 Greenfield Properties, and Harvest Small Business Finance, LLC (“Harvest”) (Archway,
7 Wells Fargo and Harvest, collectively, the “Lenders”)— in the above-entitled jointly administered
8 chapter 11 bankruptcy cases (the “Bankruptcy Cases”) hereby stipulate as follows:

9 **RECITALS**

10 1. On March 18 and 19, 2024 the Debtors filed their jointly administered voluntary
11 chapter 11 cases.

12 2. On June 7, 2024 the Debtors filed their *Motion By Affected Debtors For Entry Of An*
13 *Order Authorizing Use Of Cash Collateral Pursuant To 11 U.S.C. § 363(c)(2)* (“Motion”) (Docket
14 No. 87).

15 3. The initial hearing on the Motion was held on June 20, 2024 on shortened time.

16 4. A continued hearing was scheduled for July 23, 2024, at 11:00 a.m.

17 5. On June 17, 2024, Wells Fargo filed Oppositions to Debtor’s Motion with respect to
18 the 2220 Bagley and 3538 Greenfield Properties. *See* Docket Nos. 100 and 101.

19 6. On June 17, 2024, Archway filed an *Objection by Archway Real Estate Income Fund*
20 *I SPE I, LLC to Motion by Affected Debtors for Entry of an Order Authorizing Use of Cash*
21 *Collateral Pursuant to 11 U.S.C. § 363(c)(2)* (“Archway Objection”) (Docket No. 99).

22 7. On June 18, 2024, Archway filed a *Status Report re Objection by Archway Real*
23 *Estate Income Fund I SPE I, LLC to Motion by Affected Debtors for Entry of an Order Authorizing*
24 *Use of Cash Collateral Pursuant to 11 U.S.C. § 363(c)(2)* (“Status Report”) (Docket No. 104). In the
25 Status Report, Archway consented to limited use of cash collateral on an interim basis under certain
26 conditions set forth therein, including that Archway’s rights and remedies with respect to the
27 Archway Objection be reserved and preserved and that it be granted certain adequate protection,
28

1 including a replacement lien and restrictions on the use of cash collateral, as set forth therein
2 (collectively, “Archway Rights and Protections”).

3 8. On July 18, 2024, the Court entered its order authorizing the Debtors’ interim use of
4 cash collateral through July 23, 2024 (Docket No. 127) (the “Interim Cash Collateral Order”). The
5 Interim Cash Collateral Order sets forth, preserves, and reaffirms certain rights and adequate
6 protection measures in favor of the Lenders, including the Archway Rights and Protections
7 (collectively, the “Lender Rights and Protections”).

8 9. A continued hearing on interim use of cash collateral was scheduled for July 23,
9 2024.

10 10. On July 22, 2024, the Debtors and Lenders submitted a stipulation to continue the
11 hearing interim use of cash collateral and extend authorization for use of cash collateral by
12 approximately one month to August 27, 2024 (Docket No. 131).

13 11. On July 23, 2024, the Court entered its order approving the stipulation, thereby
14 authorizing the use of cash collateral and continuing the hearing to August 27, 2024.

15 12. On August 26, 2024, the Debtors and Lenders submitted a stipulation to further
16 continue the hearing on interim use of cash collateral and to extend authorization for use of cash
17 collateral to October 8, 2024 (Docket No. 174).

18 13. On August 26, 2024, the Court entered its order approving the stipulation, which
19 authorized cash collateral use and continued the hearing to October 8, 2024 (Docket No. 176).

20 14. On October 3, 2024, the Debtors and Lenders submitted a further stipulation to
21 continue the hearing on interim use of cash collateral and to extend authorization for use of cash
22 collateral to November 12, 2024 at 11:00 a.m. (Docket No. 210).

23 15. On October 9, 2024, the Court entered its order approving the stipulation, which
24 authorized cash collateral use and continued the hearing to November 12, 2024 (Docket No. 215).

25 16. The Lenders and the Debtors discussed and agreed to further extend cash collateral
26 use, subject to adequate protection in the form of, without limitation, the Lender Rights and
27 Protections.

28 17. Accordingly the Lenders and the Debtors enter into this stipulation.

STIPULATION

18. The foregoing recitals are incorporated herein.

19. The Lenders and the Debtors stipulate and agree that the hearing on the Motion should be further continued from November 12, 2024 at 11:00 a.m. to December 10, 2024 at 11:00 a.m. (based on the Court's "Available Self-Calendaring Dates"), or to another date convenient to the Court that is approximately one month after November 12, 2024.

20. The Lenders and the Debtors stipulate and agree that the Debtors' authorization to use cash collateral should be extended through the same date as the further continued hearing, subject to the Lender Rights and Protections.

21. The Lenders and the Debtors stipulate and agree that all the terms of the Interim Cash Collateral Order, including the Lender Rights and Protections, shall remain in full force and effect and unchanged except for the extension of the period of authorization to use cash collateral and the continuance of the hearing date on the Motion.

IT IS SO STIPULATED.

Dated: November 8, 2024

SAUL EWING LLP

By: /s/ Zev Shechtman
Zev Shechtman, Attorneys for Individual Debtors

Dated: November __, 2024

**WEINTRAUB ZOLKIN TALERICO & SELTH
LLP**

By: _____
Derrick Talerico, Attorneys for Corporate Debtors

[Signatures Continued on Next Page]

1 **IT IS SO STIPULATED.**

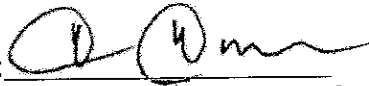
2
3 Dated: November 7, 2024

FRANDZEL ROBINS BLOOM & CSATO, L.C.

4 By: _____
5 Gerrick M. Warrington, attorneys for ARCHWAY
6 BROADWAY LOAN SPE, LLC

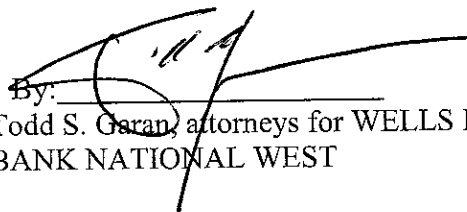
7 Dated: November 08, 2024

HEMAR, ROUSSO & HEALD, LLP

8 By: 
9 Jacqueline L. James, attorneys for HARVEST
10 SMALL BUSINESS FINANCE, LLC

11 Dated: November 8, 2024


ALDRIDGE PITE, LLP

12 By: 
13 Todd S. Garan, attorneys for WELLS FARGO
14 BANK NATIONAL WEST
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1 **IT IS SO STIPULATED.**

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3 Dated: November 7, 2024

FRANDZEL ROBINS BLOOM & CSATO, L.C.

4 By: 
5 Gerrick M. Warrington, attorneys for ARCHWAY
6 BROADWAY LOAN SPE, LLC

7 Dated: November __, 2024

HEMAR, ROUSSO & HEALD, LLP

8
9 By: _____
10 Jacqueline L. James , attorneys for HARVEST
11 SMALL BUSINESS FINANCE, LLC

12 Dated: November __, 2024

ALDRIDGE PITE, LLP

13 By: _____
14 Todd S. Garan, attorneys for WELLS FARGO
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PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:
Saul Ewing LLP, 1888 Century Park East, Suite 1500, Los Angeles, CA 90067

A true and correct copy of the foregoing document entitled (*specify*): **Stipulation to Further Continue Hearing on Motion to Authorize use of Cash Collateral Pursuant to 11 U.S.C. § 363(c)(2)** be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

1. **TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF)**: Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (*date*) **November 8, 2024**, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

☒ Service information continued on attached page

2. **SERVED BY UNITED STATES MAIL**:

On (*date*) _____, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

3. **SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL** (*state method for each person or entity served*): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (*date*) _____, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

November 8, 2024
Date

Hannah Richmond
Printed Name

/s/ Hannah Richmond
Signature

1. **TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF) (continued):**

- **Scott R Albrecht** salbrecht@gsaattorneys.com, jackie.nguyen@sgsattorneys.com
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- **United States Trustee (LA)** ustpreion16.la.ecf@usdoj.gov
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- **Jennifer C Wong** bknotice@mccarthyholthus.com, jwong@ecf.courtdrive.com